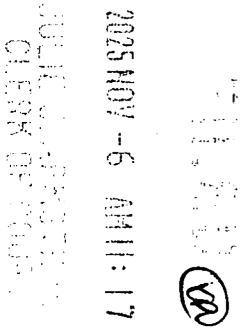
STATE OF SOUTH CAROLINA	)	
	)	**IN THE COURT OF COMMON PLEAS**
COUNTY OF CHARLESTON	)	**NINTH JUDICIAL CIRCUIT**
	)	
James C. ("Chris") McNeil and Meaghan Poyer,	)	**Civil Action No.: 2025-CP-10-05095**
	)	
Plaintiffs,	)	**NOTICE OF PRIOR SERVICE AND COMPUTED DEADLINES**
	)	
v.	)	
	)	
SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, individually, Tara Bayles, individually, and MRG Investing Company LLC,	)	
	)	
Defendants.	)	
	)	

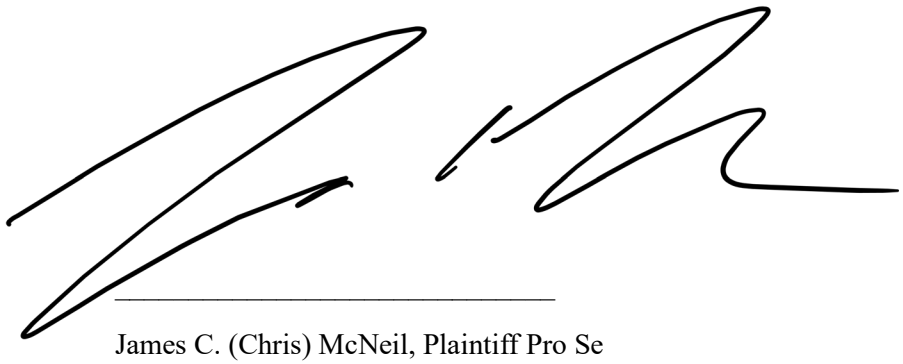


Plaintiffs give notice to the Court and all parties of the following:

1. On **October 3, 2025 at 5:17 PM**, Plaintiffs served **First Interrogatories and First Requests for Production on Meridian Residential Group, LLC; SAC 181, LLC; Adam W. Bayles; and Tara R. Bayles** through then-counsel Eric Pettis. See Exhibits A–B (service transmittal screenshot and full email with four discovery PDFs).
2. On **October 31, 2025**, Plaintiffs served their **First Requests for Admission** on counsel of record. See **Exhibit D** (Certificates of Service).
3. Plaintiffs also provided courtesy notice to SAC 181's insurer the evening of October 3, 2025. See **Exhibit C**. Mr. Pettis had previously confirmed on September 10, 2025 that he represented both management and ownership (including SAC 181, LLC) and would accept service for those entities. See **Exhibit E.**
4. Based on the above service dates—and Defendants' stated position that email service is computed with the Rule 6(e) five-day add-on—the following response deadlines apply:
    - **Interrogatories and Requests for Production** served October 3, 2025: **Due Friday, November 7, 2025**.
    - **Requests for Admission** served October 31, 2025: **Due Friday, December 5, 2025**.

This Notice seeks no relief and is submitted to maintain a clear record and avoid further confusion regarding running deadlines. Plaintiffs will proceed on the dates above absent an agreed extension or Court order.

Dated: November 5, 2025 Respectfully submitted,



_____

James C. (Chris) McNeil, Plaintiff Pro Se

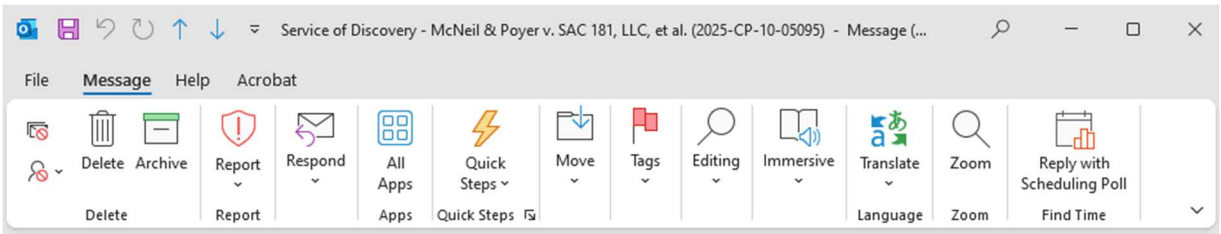
(on behalf of Plaintiffs)

P.O. Box 30386, Charleston, SC 29417

chris@thaut.io | (843) 818-3495

EXHIBIT A

Screenshot of Service email to Pettis 10/3/2025



Service of Discovery - McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)

CT

chris thaut.io
To epettis@bwpf-law.com
Cc Desja Wilder; C&M McNeil; Charlie Altman

Reply | Reply All | Forward | ...

Fri 10/3/2025 5:18 PM

Please treat this as Confidential.
This message was sent with High importance.

Discovery_Meridian_Residential_Group.pdf 333 KB
Discovery_Adam_Bayles.pdf 320 KB
Discovery_Tara_Bayles.pdf 333 KB
Discovery_SAC_181_LLC.pdf 324 KB

Mr. Pettis,

Pursuant to Rules 33 and 34 of the South Carolina Rules of Civil Procedure, Plaintiffs hereby serve the attached First Set of Interrogatories and Requests for Production of Documents upon the following defendants:

1. Meridian Residential Group, LLC
2. Tara R. Bayles, individually
3. Adam W. Bayles, individually
4. SAC 181, LLC
5. MRG Investing Company, LLC

Responses to the attached discovery are due within thirty (30) days of service, on or before November 3, 2025, regardless of any pending answer deadlines.

Pending Deadlines:

- October 15, 2025: Answer to Amended Complaint due for Adam Bayles, Tara Bayles, and Meridian Residential Group, LLC
- October 29, 2025: Answer to Amended Complaint due for SAC 181, LLC (per courtesy extension)

Important Notes:

1. **Evidence Preservation:** This discovery is served in coordination with Plaintiffs' October 2, 2025 Evidence Preservation Demand. Defendants remain under continuing obligation to preserve all potentially responsive materials, including but not limited to:
   - Native digital files with metadata intact
   - AppFolio system logs and syndication data
   - The file "Meridian_Scanner_20250905_161321.pdf" with complete forensic metadata
   - All versions of documents, including those in backup systems
2. **ESI Production Requirements:** Electronic documents must be produced in native format with all metadata preserved as specified in the discovery requests

EXHIBIT B

PDF of Service email to Pettis 10/3/2025

From:	chris thaut.io
To:	epettis@bwpf-law.com
Cc:	Desja Wilder; C&M McNeil; Charlie Altman
Subject:	Service of Discovery - McNeil & Poyer v. SAC 181, LLC, et al. (2025-CP-10-05095)
Date:	Friday, October 3, 2025 5:17:00 PM
Attachments:	Discovery_Meridian_Residential_Group.pdf Discovery_Adam_Bayles.pdf Discovery_Tara_Bayles.pdf Discovery_SAC_181_LLC.pdf
Importance:	High
Sensitivity:	Confidential

Mr. Pettis,

Pursuant to Rules 33 and 34 of the South Carolina Rules of Civil Procedure, Plaintiffs hereby serve the attached First Set of Interrogatories and Requests for Production of Documents upon the following defendants:

1. Meridian Residential Group, LLC
2. Tara R. Bayles, individually
3. Adam W. Bayles, individually
4. SAC 181, LLC
5. MRG Investing Company, LLC

Responses to the attached discovery are due within thirty (30) days of service, on or before November 3, 2025, regardless of any pending answer deadlines.

Pending Deadlines:

- October 15, 2025: Answer to Amended Complaint due for Adam Bayles, Tara Bayles, and Meridian Residential Group, LLC
- October 29, 2025: Answer to Amended Complaint due for SAC 181, LLC (per courtesy extension)

Important Notes:

1. **Evidence Preservation:** This discovery is served in coordination with Plaintiffs' October 2, 2025 Evidence Preservation Demand. Defendants remain under continuing obligation to preserve all potentially responsive materials, including but not limited to:
    - Native digital files with metadata intact
    - AppFolio system logs and syndication data
    - The file "Meridian_Scanner_20250905_161321.pdf" with complete forensic metadata
    - All versions of documents, including those in backup systems
2. **ESI Production Requirements:** Electronic documents must be produced in native

format with all metadata preserved as specified in the discovery requests.

3. **Privilege Logs:** Any documents withheld on privilege grounds require a privilege log per Rule 26(b)(5), SCRCP, within the 30-day response period.
4. **Representation Status:** Please confirm whether you continue to represent all named defendants in this matter, or whether separate counsel has been or will be retained for any party.

Please acknowledge receipt of this email and the attached discovery requests.

Respectfully,

James C. McNeil & Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386
Charleston, SC 29417
Email: chris@thaut.io; mcneilandpoyer@gmail.com
Telephone: (843) 818-3495

CC (Courtesy Copy Only - No Response Required):
Charles Altman as RA of SAC 181, LLC (caltman@caltmanlaw.com)

Note to CC Recipient: This email is being provided as a courtesy copy only to ensure you are informed of discovery served upon the defendants in this matter. All responses must be directed through counsel of record (Eric R. Pettis). We are not soliciting direct communication with represented parties with this email.

EXHIBIT C

PDF of Reply Email from Gladys Lambert 10/3/2025

From: Gladys Lambert
To: chris thaut.io; "mcneilandpoyer@gmail.com"
Subject: RE: Update - Discovery Served in McNeil v. SAC 181, LLC
Date: Friday, October 3, 2025 6:40:04 PM

Thank you for the notice.

IPG Logo

Gladys Lambert, MBA, CPCU, AIC, AINS, CA License 6003996 (IPG)
Senior Claims Examiner
gladys.lambert@ipgclaims.com
Direct : 501-725-3425 (Phone/Text/Fax)
Toll Free : 800-684-9157 x4095

International Programs Group – ipgclaims.com
P.O. Box 45058, Little Rock, AR 72214

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From: chris thaut.io <chris@thaut.io>
Sent: Friday, October 3, 2025 4:27 PM
To: Gladys Lambert <gladys.lambert@ipgclaims.com>; 'mcneilandpoyer@gmail.com' <mcneilandpoyer@gmail.com>
Subject: Update - Discovery Served in McNeil v. SAC 181, LLC

CAUTION - EXTERNAL EMAIL | ATTENTION - COURRIEL EXTERNE

Ms. Lambert,

Thank you for your prior communication regarding the extension for SAC 181, LLC to retain separate counsel.

I wanted to inform you that today we served comprehensive discovery requests on all defendants, including SAC 181, LLC. Responses are due November 3, 2025, shortly after the October 29 answer deadline.

The discovery addresses:

- Charles Altman's personal involvement in decisions regarding our tenancy
- SAC 181's financial condition and assets
- Knowledge of the 2020-2021 litigation and its influence on 2025 actions
- Insurance coverage information

All formal communications should continue through Mr. Eric Pettis at Brownlee Whitlow and Praet, who, to our knowledge, currently represents all defendants, excepting MRG

Investing Company, LLC, who remains unrepresented to our knowledge, or through separate counsel once retained by SAC 181, LLC.

Given the compressed timeline (October 29 answer + November 3 discovery responses), we wanted to ensure you were aware of these deadlines as you coordinate SAC 181's separate representation.

Respectfully,

James C. McNeil and Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386 • Charleston, SC 29417
chris@thaut.io | mcneilandpoyer@gmail.com • (843) 818-3495

From: chris thaut.io
Sent: Wednesday, October 1, 2025 12:03 PM
To: Gladys Lambert <gladys.lambert@ipgclaims.com>; mcneilandpoyer@gmail.com
Subject: RE: Concerning claim 147434 - SAC 181 LLC (63522-91095) (Enhanced Jury Risk Analysis V4 - Extension Conditions for SAC 181, LLC)

Ms. Lambert,

Thank you for the coverage information.

Plaintiffs consent to extending SAC 181, LLC's answer deadline to October 29, 2025. Please provide defense counsel's contact information once assigned.

Note: We filed two motions yesterday regarding the other defendants. Your voluntary disclosure resolved SAC 181's portion of the insurance disclosure motion.

Respectfully,

James C. McNeil and Meaghan Poyer
Plaintiffs Pro Se
PO Box 30386 • Charleston, SC 29417
chris@thaut.io | mcneilandpoyer@gmail.com • (843) 818-3495

From: Gladys Lambert <gladys.lambert@ipgclaims.com>
Sent: Wednesday, October 1, 2025 9:51 AM

To: chris thaut.io <chris@thaut.io>; mcneilandpoyer@gmail.com
Subject: RE: Concerning claim 147434 - SAC 181 LLC (63522-91095) (Enhanced Jury Risk Analysis V4 - Extension Conditions for SAC 181, LLC)

Good morning,

1. Confirmation of defense counsel assignment and contact information: Defense is being provided and counsel will be assigned
2. Insurance policy limits for relevant coverage $500,000 policy limits
3. Coverage position (accepted, denied, or under reservation of rights) Defense under reservation of rights
4. Whether coverage extends to punitive damages No coverage for punitive damages

Regards,

Gladys Lambert, MBA, CPCU, AIC, AINS, CA License 6003996 (IPG)
Senior Claims Examiner
gladys.lambert@ipgclaims.com
Direct : 501-725-3425 (Phone/Text/Fax)
Toll Free : 800-684-9157 x4095

International Programs Group – ipgclaims.com
P.O. Box 45058, Little Rock, AR 72214

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From: chris thaut.io <chris@thaut.io>
Sent: Monday, September 29, 2025 11:45 AM
To: Gladys Lambert <gladys.lambert@ipgclaims.com>; mcneilandpoyer@gmail.com
Subject: RE: Concerning claim 147434 - SAC 181 LLC (63522-91095) (Enhanced Jury Risk Analysis V4 - Extension Conditions for SAC 181, LLC)

CAUTION - EXTERNAL EMAIL | ATTENTION - COURRIEL EXTERNE

Ms. Lambert,

Thank you for clarifying IPG's coverage scope (SAC 181 only).

Attached is Enhanced Jury Risk Analysis V4, reflecting evidence developments since JRA V3.

Regarding your extension request: I can agree to October 29, 2025 for SAC 181's answer deadline, conditioned upon receiving the following information within 10

EXHIBIT D

Two Certificates of Service for Discovery Served

STATE OF SOUTH CAROLINA	)	
	)	**IN THE COURT OF COMMON PLEAS**
COUNTY OF CHARLESTON	)	**NINTH JUDICIAL CIRCUIT**
	)	
James C. ("Chris") McNeil and Meaghan Poyer,	)	**Civil Action No.: 2025-CP-10-05095**
	)	
Plaintiffs,	)	**CERTIFICATE OF SERVICE**
	)	
v.	)	
	)	
SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, individually, Tara Bayles, individually, and MRG Investing Company LLC,	)	
	)	
Defendants.	)	

FILED
2025 NOV -5 AM 11:20
JULIE J. ARMSTRONG
CLERK OF COURT

Documents Served: First Set of Interrogatories and Requests for Production of Documents for Meridian Residential Group, LLC, Tara R. Bayles (individually), Adam W. Bayles (individually), and SAC 181, LLC

Dates of Service: October 3, 2025 (SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles) and November 5, 2025 (MRG Investing Company, LLC)

Address List: Eric R. Pettis, Esq. (Former Counsel for Defendants) epettis@bwpf-law.com, (MRG Investing Company, LLC) 8310 Rivers Ave. Suite B, North Charleston, SC 29406.

I, James C. McNeil, do hereby certify that, in connection with the above referenced case:

(1) On October 3, 2025, I served Eric R. Pettis, Esq, the then-counsel of record for Defendants SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles by electronic mail at epettis@bwpf-law.com.

(2) On November 5, 2025, I served MRG Investing Company by FedEx Ground to its actual operating address of 8310 Rivers Ave. Suite B, North Charleston, SC 29406.

James C. McNeil, Pro Se

STATE OF SOUTH CAROLINA	)	
	)	**IN THE COURT OF COMMON PLEAS**
COUNTY OF CHARLESTON	)	**NINTH JUDICIAL CIRCUIT**
	)	
James C. ("Chris") McNeil and Meaghan Poyer,	)	**Civil Action No.: 2025-CP-10-05095**
	)	
Plaintiffs,	)	**CERTIFICATE OF SERVICE**
	)	
v.	)	
	)	
SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, individually, Tara Bayles, individually, and MRG Investing Company LLC,	)	
	)	
Defendants.	)	

Documents Served: First Requests for Admission for Meridian Residential Group, LLC, Tara R. Bayles (individually), Adam W. Bayles (individually), and SAC 181, LLC

Dates of Service: October 31, 2025 (SAC 181, LLC, Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles) and November 5, 2025 (MRG Investing Company, LLC)

Address List: Justine Tate: justine.tate@phelps.com, Kevin O'Brien: kevin.o'brien@phelps.com, Alicia Bolyard: abolyard@rlattorneys.com, (MRG Investing Company, LLC) 8310 Rivers Ave. Suite B, North Charleston, SC 29406.

I, James C. McNeil, do hereby certify that, in connection with the above referenced case:

(1) On October 31, 2025, I served Justine Tate, Esq and Kevin O'Brien, counsel of record for Defendant SAC 181, LLC by electronic mail at, respectively, justine.tate@phelps.com and kevin.o'brien@phelps.com.
(2) On October 31, 2025, I served Alicia Bolyard, Esq, counsel of record for Defendants Meridian Residential Group, LLC, Adam W. Bayles, and Tara Bayles by electronic mail at abolyard@rlattorneys.com.
(3) On November 5, 2025, I served MRG Investing Company by FedEx Ground to its actual operating address of 8310 Rivers Ave. Suite B, North Charleston, SC 29406.

James C. McNeil, Pro Se

EXHIBIT E

September 10, 2025 email from Pettis confirming he represents both Meridian Residential Group, LLC and SAC 181, LLC

From: Eric Pettis
To: chris thaut.io; mcneilandpoyer@gmail.com
Cc: Desja Wilder
Subject: RE: Notice of Representation- Meridian Residential Group, LLC - Demand Letters
Date: Wednesday, September 10, 2025 9:41:08 AM
Attachments: image001.png
Sensitivity: Confidential

Greetings Chris,

Yes, I represent both management and ownership (SAC 181, LLC). Thank you.

With sincere appreciation,

Eric Pettis | Associate
Licensed in PA and SC



Brownlee Whitlow & Praet
PROPERTY SOLUTIONS LAW

Mailing Address: P.O. Box 62975, N. Charleston, South Carolina 29419
Physical Address: 4000 Faber Place Drive, Suite 100, N. Charleston, South Carolina 29405
Firm: (843) 628-7120 | **Direct Phone/Fax: (843) 213-6835**
Email: epettis@bwpf-law.com
Web: BWPF-Law.com

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Consumer Debt Collection Warning: To the extent any portion of this email relates to a consumer debt, please be advised that this email message is an attempt to collect a debt and any information provided may be used for that purpose.

From: chris thaut.io <chris@thaut.io>
Sent: Wednesday, September 10, 2025 9:29 AM
To: Eric Pettis <epettis@bwpf-law.com>; mcneilandpoyer@gmail.com
Cc: Desja Wilder <dwilder@bwpf-law.com>
Subject: RE: Notice of Representation- Meridian Residential Group, LLC - Demand Letters
Importance: High
Sensitivity: Confidential

Mr. Pettis,

Thank you for your response regarding representation of Meridian Residential Group, LLC.

Please clarify your representation scope: Do you represent only Meridian Residential

Group, LLC, or do you also represent SAC 181, LLC (the property owner)? Ms. Bayles indicated your firm represents both entities. If you do not represent SAC 181, LLC, are you aware of their separate legal representation?

As you review the case materials, you'll recognize this extends beyond a routine deposit dispute. The documented conduct - falsified postal markings, systematic corporate violations, and disregard for statutory tenant protections - reflects a pattern.

I want to be clear that this case is fundamentally about principle..

Property managers wield significant power over vulnerable families' ability to maintain stable housing. When that responsibility is violated through deliberate and reckless misconduct, accountability serves essential community interests. While I harbor no ill will toward your client, meaningful consequences are necessary to protect tenants in general from such conduct.

The multiple areas of exposure favor early resolution, and I'm prepared to settle promptly. However, the resolution must reflect real accountability that serves the broader principle of protecting families from property management abuse.

Please confirm representation scope within 48 hours so we may proceed with appropriate service protocols.

Respectfully,

Chris McNeil & Meaghan Poyer
Pro Se Plaintiffs
Case No. 2025CP1005095
480A Parkdale Dr. Charleston, SC 29414 | 843-818-3495 (Chris mobile)
Chris@thaut.io
mcneilandpoyer@gmail.com

From: Eric Pettis <epettis@bwpf-law.com>
Sent: Tuesday, September 9, 2025 10:17 PM
To: chris thaut.io <chris@thaut.io>; mcneilandpoyer@gmail.com
Cc: Desja Wilder <dwilder@bwpf-law.com>
Subject: Notice of Representation- Meridian Residential Group, LLC - Demand Letters

Greetings Chris and Meaghan,

Please take notice that I am legal counsel for MERIDIAN RESIDENTIAL GROUP, LLC and have been retained to represent them in connection with your previous demands and allegations asserted against them.

If you have in fact filed a civil action against my Client, I will accept service on their behalf upon receipt of the filed documents.

Once I have reviewed this matter and any filings you have made, I will issue a response or file responsive pleadings as appropriate. Thank you.

With sincere appreciation,

Eric Pettis | Associate
Licensed in PA and SC

Brownlee Whitlow & Praet
PROPERTY SOLUTIONS LAW

Mailing Address: P.O. Box 62975, N. Charleston, South Carolina 29419
Physical Address: 4000 Faber Place Drive, Suite 100, N. Charleston, South Carolina 29405
Firm: (843) 628-7120 | **Direct Phone/Fax: (843) 213-6835**
Email: epettis@bwpf-law.com
Web: BWPF-Law.com

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